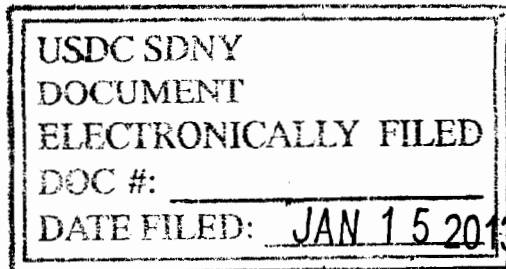


January 14, 2013

Via Facsimile

The Honorable Laura Taylor Swain  
United States District Court for the  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY 10007



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Re: *Ermini v. Vittori*, Case No. 12-cv-06100 (LTS) (HJP)

**MEMO ENDORSED**

Dear Judge Swain:

We represent Respondent Viviana Vittori in the above-referenced action. Pursuant to Sections 1.a. and 1.e. of your Individual Practices, we write to request the below-outlined modification to our current schedule. We have attempted to consult with counsel for Petitioner Emiliano Ermini regarding this request, but we have received no response to our email sent yesterday or our email and voice mail sent today.

Our co-counsel Ellen Holtzman previously was granted two adjournments of the initial pre-trial conference in this matter. We, jointly with opposing counsel, previously were granted a modification of the expert discovery schedule and a modification of the schedule for pre-trial motions and the preliminary pre-trial conference.

The current schedule requires that the parties conduct a preliminary pre-trial conference today and submit our joint pre-trial statement to the Court tomorrow, January 15, 2012. The pre-trial statement must include any objections to trial exhibits and deposition designations. In order to permit the parties to more carefully consider any objections, we request that the deadline for the submission of objections be extended to Friday, January 18, 2013. No other deadlines, including the date for submission of the joint pre-trial statement to the Court, will be affected by our proposed schedule. We are not requesting any change to our trial date of January 28, 2013.

Thank you for your attention to this matter.

Respectfully submitted,

Jacob Press

cc: Rocco Lamura, Esq. (via email)  
Jacqueline Sands, Esq. (via email)

The deadline is extended to Friday January 18, 2013, at 12:00pm noon. The joint statement must be filed on ECF and a courtesy copy must be faxed to chambers.

**SO ORDERED.**

NEW YORK, NY

Jan 14, 2013

LAURA TAYLOR SWAIN

UNITED STATES DISTRICT JUDGE